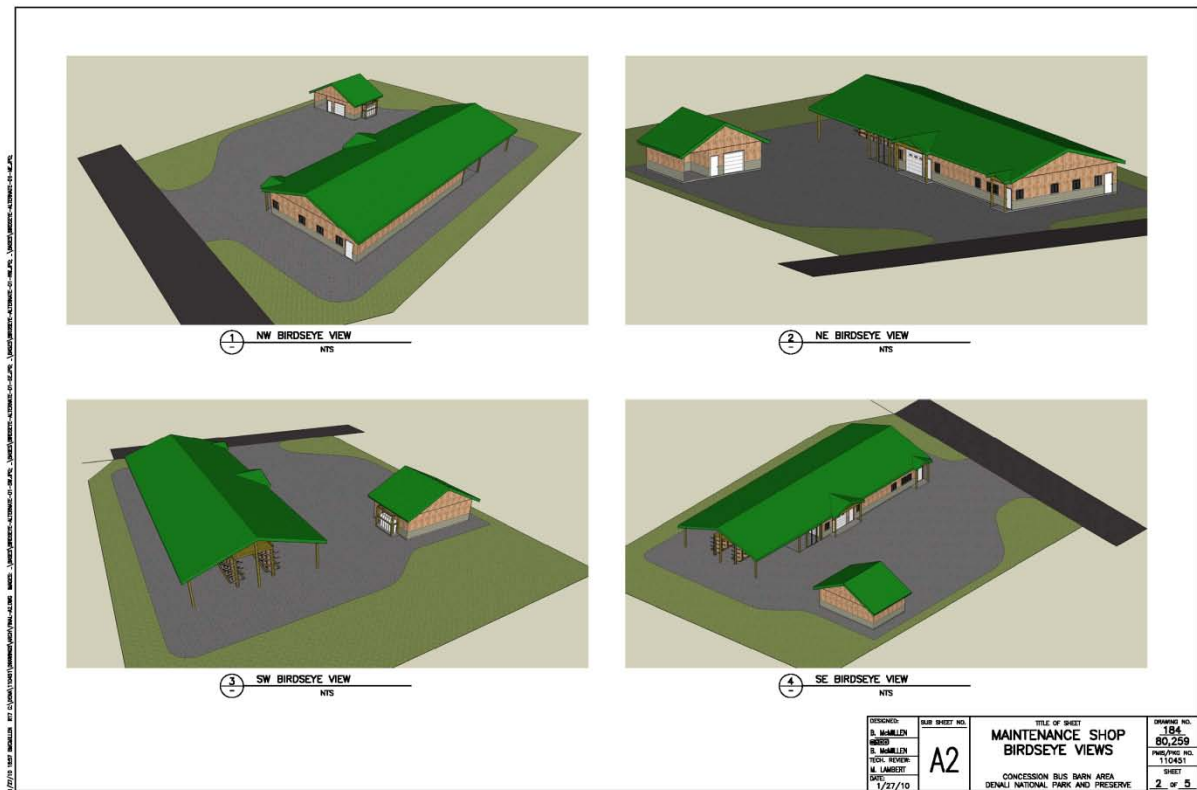


National Park Service  
U.S. Department of the Interior

Denali National Park and Preserve  
Alaska



## Concession Facilities Construction Environmental Assessment April 2011



## PURPOSE AND NEED

The National Park Service (NPS) is proposing to construct new permanent facilities on the Concession Land Assignment that would support Denali National Park and Preserve's current and future transportation and other visitor services concession. The proposed facilities include a Maintenance Shop, Commissary, Employee Fitness Center and Recycling Center.

The Concessions Land Assignment (CLA) (see Figure 2) is park land and the facilities thereon assigned to the concessionaire to carry out and support visitor services within the park. The CLA's main purpose is to support and facilitate bus fleet operations and maintenance in the park. Additional activities which occur on the CLA include housing, dining, and recreation facilities for Denali concession employees. The concessionaire is required to carry out a building and utilities maintenance operation for the land assignment facilities and other directed services throughout the park.

A new Maintenance Shop and covered storage area would replace in entirety the current ATCO and trailer that are dilapidated and unsuited for the purpose. The old facilities would be removed from the park and the site location would be reutilized as open space.

A new Recycling Center building would provide a centralized collection and processing facility for concessions and park recycled waste materials. The concessioner transfers most of the recycled materials from the park to town and needs an efficient separation and storage facility.

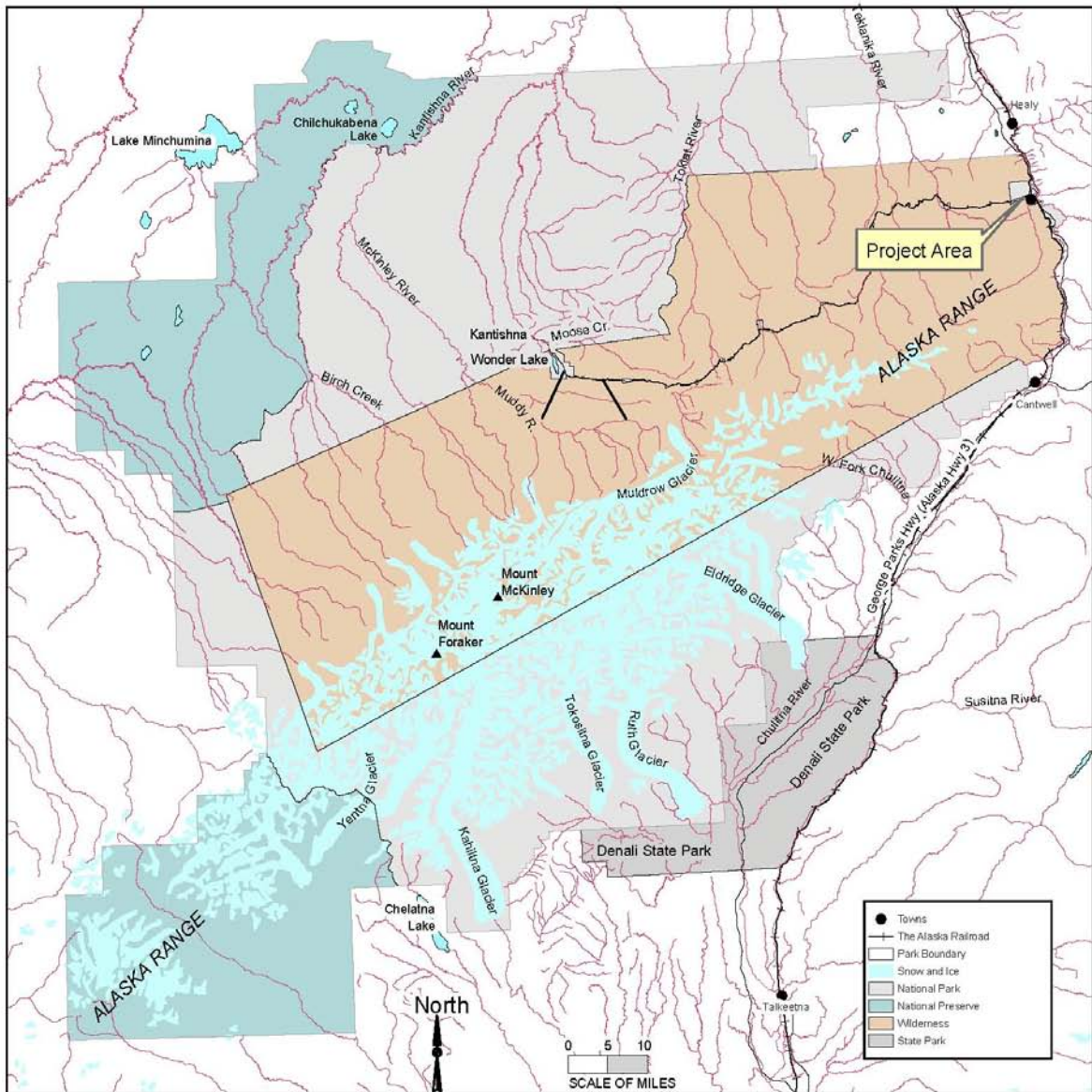
A new Commissary building would be built to support food and beverage services required of the concessioner, plus provide additional storage for the Employee Dining Room and Morino Grill, a public restaurant located in the Denali Visitor Center campus. This building would integrate, into one facility, storage space and operations currently performed in other various concessions facilities and off-park locations.

A new employee Fitness Center building would be constructed in order to place scattered fitness equipment into one structure next to the employee dorms.

A plan to construct a new Denali Visitor Center, a new Denali Science and Learning Center [now the Murie Science and Learning Center, (MSLC)], a new fueling site and access road on the western side of the bus parking lot, and rerouted utility corridors to serve the new destinations in the park's entrance area was approved on 1/31/02 in the Finding of No Significant Impact for the *2001 Environmental Assessment for Construction of New Visitor Facilities in the Entrance Area of Denali National Park* (2001 EA). Up to 13 acres of vegetation was approved to be removed or disturbed and about 3.3 acres restored, for a net loss of 9 to 10 acres of vegetation and soils. Approximately 11 acres of park land have been disturbed for this construction so far, and one acre is being reserved for the future construction of MSLC dorms. An acre reserved for improvements and replacements to concessioner facilities did not specify which facilities would be replaced.

This environmental assessment (EA) analyzes the potential environmental impacts which could result from the construction of the facilities listed above, and from the No Action alternative. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, regulations of the Council of Environmental Quality (40 CFR 1508.9), and the NPS NEPA

compliance guidance handbook (Director's Order 12, *Conservation Planning, Environmental Impact Analysis, and Decision Making*)(NPS, 2001).



Location in Alaska

Figure 1  
Project Location  
Denali National Park and Preserve  
U.S. Department of the Interior National Park Service

## **DESCRIPTION OF ALTERNATIVES**

### **Alternative 1: No Action**

Under the no-action alternative a new Maintenance Shop, Commissary, Recycling Center, and Fitness Center would not be constructed. The functions related to these proposed structures would still be necessary, but would occur in the temporary, substandard spaces presently occupied. The existing concession maintenance facilities house the staff, equipment and tools to provide upkeep for concession-operated public facilities including sanitary restrooms and for the upkeep of staff housing ranging from dormitories to small cabins.

The CLA boundary would remain unchanged.

### **Alternative 2: Construct New Concessioner Facilities (NPS Preferred Alternative)**

A new 2,750 sq. ft. Maintenance Shop building (for carpentry, plumbing, electrician) and 1,780 sq. ft. covered storage area would replace in entirety the current ATCO and trailer which are inadequately sized, dilapidated, and inappropriate for general maintenance operations. The old facilities would be removed from the park and the site location reutilized as open space between employee housing and the bus maintenance operation, or parking for vehicles needing repair. Another 13,770 sq. ft. would be used for parking and vehicle circulation at the new shop site. Revegetation for that facility would include the preservation of the natural buffer of 150 feet of forest, plus an enhanced buffer of salvaged trees placed into an abandoned roadbed, as those replanted trees gain maturity

A new 2,500 sq. ft. Commissary building would support food and beverage services required of the concessioner, plus provide additional food and beverage storage for the Employee Dining Room and the Morino Grill, a public dining facility located on the Denali Visitor campus. Another 3,000 sq. ft. would be used for a driveway and for indirect impacts from construction.

A new 1,800 sq. ft. concession employee Fitness Center would be constructed near the concession employee dorms. The Fitness Center would absorb the appropriate activities that are currently, in portion, performed in the Horseshoe Recreation Hall and the Erratics television and entertainment room. The later facilities would see this space transition to their intended design and use. Another 1,000 sq. ft. would be required for indirect impacts from construction.

A new 800 sq. ft. Recycling Center building would provide a centralized collection and processing facility for concessions and park materials. The Recycling Center is planned for the Maintenance Shop maintenance yard (see EA cover page).

Any outdoor lighting at the new concession facilities would be kept to a minimum and would be fully shielded so that artificial light would not extend beyond the immediate work areas and would not extend upwards.

The total disturbance from constructing these new structures would be about 27,400 sq. ft, or about 0.6 acres. The CLA boundary would be expanded by approximately 0.43 acres.

## **Alternatives Considered But Eliminated from Detailed Study**

Three alternate sites were considered for the concessioner Maintenance Shop. All were in or adjacent to the CLA. Following the 2001 EA, locations outside the park were not again considered.

The first site was at the existing location of the maintenance shops in trailers north of the bus barn. The second site was west of the bus parking lot. The third site was south of the bus parking lot. The second and third sites would require an expansion of the CLA. A main problem with all three alternate sites is safety regarding vehicle circulation in areas with frequent pedestrians. The Maintenance Shop is and will continue in its new location to be a busy place. Lots of vehicles come and go through the day, especially to locations in the park outside of the CLA via the Park Road. The site proposed in this EA is closer to the Park Road than the three alternate sites, so vehicle circulation would be better and pedestrian conflicts would be fewer.

The alternative site at the existing maintenance shop location is good in that it would not require an expansion of the CLA. However, it is the worst of the considered locations because of vehicle-pedestrian conflicts. It is nearest the concession housing area. It is nearest the bus barn, which is a bus servicing facility where employees make frequent walks to pick up buses for servicing, washing or fueling.

The second alternative site, west of the bus parking lot, conflicts with existing plans (2001 EA) to construct a new bus fueling facility (for diesel, unleaded, biofuels, and liquified natural gas) with a loop access road for tanker trucks. The Maintenance Shop traffic could use the future tanker truck access road and avoid the vehicle-pedestrian safety problem, but the route would be much farther from the Park Road than the proposed site, and there would be safety concerns with more vehicles using the same route – maintenance vehicles, buses, and occasional tanker trucks. There is a visitor trail in the woods west of the bus parking lot in this area, and it would need to be rerouted onto a hill slope under this alternative site. There is a slope west of the bus parking lot, and it would need more cut-and-fill earth work than the proposed site. There would be added cost for a longer sewer line extension to the Maintenance Shop at this site.

The third alternative site, south of the bus parking lot, conflicts with the existing plans (2001 EA) to construct a new loop access road for fuel tanker trucks. As with the above site, the Maintenance Shop traffic could use the future tanker truck access road and avoid the vehicle-pedestrian safety problem, and the route would be farther from the Park Road than the proposed site, and there would also be safety concerns with more vehicles using the same route -- maintenance vehicles, buses, and occasional tanker trucks. There is a wetland area south of the bus parking lot and it would be best to avoid this area both for wetlands protection and for building foundation stability. There would be added cost for a longer sewer line extension to the Maintenance Shop at this site.

For site selection, it was generally preferred to locate the Maintenance Shop near the Park Road, away from vehicle-pedestrian conflict areas, near existing sewer and other utility lines, hidden from public area views by trees, and not near potentially sensitive cultural or archeological resources.

## ENVIRONMENTAL CONSEQUENCES

### Alternative 1: No Action:

No new impacts would accrue to any park natural resources under the No Action Alternative. Maintenance of the concessioner facilities would remain inefficient, with sub-standard facilities and storage for the plumber, carpenters, and electrician scattered in dilapidated structures originally used for seasonal housing. Without the new Maintenance Facility, the concessionaire would continue to be hamstrung by sub-standard facilities, which would continue to negatively impact their ability to adequately and professionally manage their assigned buildings, including the Morino Grill, Alaska Geographic Bookstore, the Wilderness Access Center, Riley Creek Mercantile and Employee Dining Room. As these new buildings continue to age, more maintenance will be required. A Maintenance Shop with standard, expected tools and spare parts would be essential for the timely repair of building assets, and for the retention of experienced employees.

Likewise, the preparation area and storage area for the variety of food services provided by the concessioner in the Morino Grill, Employee Dining Building, and for Tour bus box lunches would continue to be scattered in old housing units which are unsuited for this purpose, this making these functions inefficient and more expensive.

The concessioner is a major player in recycling materials in the Denali frontcountry, as it has four drop-off points, but it has no permanent storage area to protect the recyclables awaiting shipment to processing centers. The concessionaire's ability to collect and handle recyclables such as beverage containers, cardboard and paper is limited, and they rely on infrastructure at other properties outside the park immediately adjacent to the Entrance Area. If a new company is awarded the NPS concession contract once the existing contract is up for renewal, the concessionaire would not be able to properly handle recyclables and would send them to a landfill instead.

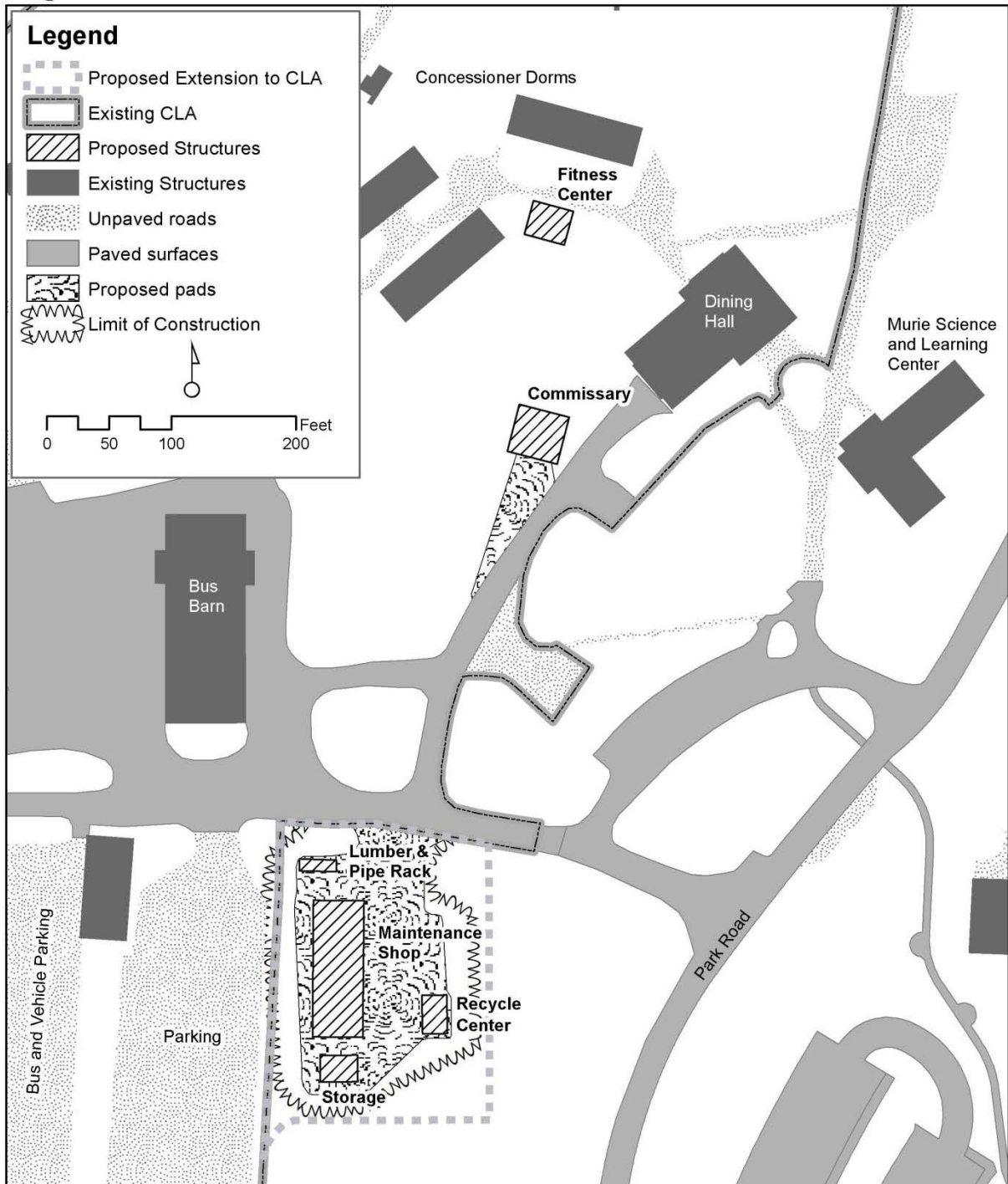
The vast majority of Denali's seasonal concession staff are college age and seek appropriate activities in their off hours. Employee fitness equipment is currently scattered in dining and snack structures, providing a conflict between those wanting to work out with those having a meal.

*Cumulative Effects:* Over 80 acres of land have been disturbed in the park's entrance area in the past century due to construction for the Alaska Railroad, Denali Park Road, McKinley Airstrip, Denali Visitor Center complex, MSLC, Wilderness Access Center, bus barn and bus parking area, concessioner housing and support facilities and hiking trails (2001 EA). Another 5 acres was disturbed for the renovation of the wastewater treatment facility. This disturbance has had a moderate effect on the natural resources of the area. Construction of up to three managers' housing duplexes for a total of 0.4 acres of additional disturbance, near the north end of the bus maintenance facility for the year-round use of concessionaire management and maintenance staff, was approved after review in the 2001 EA and is slated for construction by 2014. Also approved in the 2001 EA were upgrades to the water, sewer, electrical, fire alarm and fiber optic systems in the CLA.

No additional acreage would be disturbed under Alternative 1.

*Conclusion:* Alternative 1 would have no effect on the area's natural resources and no effect on the park's cultural resources. Alternative 1 would have a minor impact on park operations by hampering efforts to modernize and make more efficient the maintenance, food storage, and recycle functions of the concessioner, and would leave concessioner employee fitness equipment separated in non-ideal locations. The level of impact to natural resources from Alternative 1 would not result in impairment of park resources that fulfill specific purposes identified in the enabling legislations or that are essential to the natural and cultural integrity of the parks.

**Figure 2**



## **Alternative 2: Construct New Concession Facilities (NPS Preferred Alternative)**

Vegetation and Soils: Approximately 0.6 acres of mixed white spruce-hardwood (aspen) would be removed from three areas in the CLA, including areas that would be used for parking and construction access. This forest has grown up since the entrance area fires of 1924, with spruce up to 40 feet in height and aspen to 30 feet. Spruce to 15 feet in height would be salvaged for area revegetation efforts. Soils would be removed to level the site, allow for foundations, and to bring in non frost-susceptible gravels. The disturbance to vegetation and soils would have a minor impact given the areas immediately adjacent to the site with similar vegetation and soils communities.

Wildlife: There would be permanent displacement of 0.6 acres of wildlife habitat due to removal of vegetation and soil. There would be additional impact to wildlife from noise and human activities during the construction and use of the facilities. None of the areas involved are prime habitat for large mammals given the proximity to other occupied facilities, such as the bus barn, bus parking lots, concessioner housing and MSLC. No squirrel nests or bird nests are known from these patches of trees. The small mammals that occupy the habitat lost would find thousands of acres of similar forest nearby. No listed or proposed, threatened or endangered species or habitat, or species of special concern occur in the area of potential effect. The disturbance to wildlife habitat would have a minor impact on local wildlife habitat due to the tens of thousands of acres immediately adjacent with similar habitat.

Visitor Use and Enjoyment: The areas involved are assigned to the use of the concessioner and not to the public. To the extent that these new facilities would help make it easier for the concessioner to provide quality services to the public, there would be a minor benefit. None of the new facilities would be readily visible from the usual public areas, such as the park road, with the possible exception of the Maintenance Shop. Vegetative screening for that facility would include the preservation of the natural buffer of 150 feet of forest, plus an enhanced buffer of project salvaged trees in an abandoned roadbed, as those replanted trees gain maturity.

Wetlands and Riparian areas: No wetlands, riparian zones, or floodplains would be impacted during this work.

Soundscape: There would be short-term noise from the power equipment, vehicles and construction crews during the construction phases. The long-term noise from the use of the structures would be within the range of noise in the area now produced by the buses, other vehicles, and bus maintenance operations, and would have a negligible impact to park visitors on nearby trails or on the Park Road.

Air Quality: There would be short-term negligible impacts to local air quality from power equipment and vehicles during construction. These would not result in exceedances of the National Ambient Air Quality Standards in the area even though the park is a Class I air quality area. There would be no permanent increase in air quality impacts since the new structures would house existing functions.

Night Sky Darkness: The new facilities would have negligible impacts to night sky natural darkness and star visibility because they would be constructed during daylight hours and operated without unshielded outdoor area lighting.

Wilderness: The area involved is zoned non-eligible for wilderness designation.

Cultural Resources: A total of nine cultural resources have been identified within 0.25 miles of the proposed construction sites. These cultural resources include two unevaluated prehistoric sites, four unevaluated historic sites, one unevaluated historic structure, and one historic road. The historic structure is the Hotel Powerhouse. This structure is currently under evaluation to determine if it will be recommended eligible to the National Register of Historic Places. The Denali Park Road (HEA-429, MMK-171) is recommended eligible to the National Register of Historic Places under Criteria A, because of its association with broad patterns of history and under Criterion C, for engineering, as an example of road construction techniques in the far north. No cultural resources will be affected by the proposed action. If cultural resources or items protected by the Native American Graves Protection and Repatriation Act are discovered during project implementation all work in that area must stop and the Superintendent and park archaeologist notified immediately.

Park Operations: Moving the concession maintenance functions outside the bus barn area would reduce non-bus related vehicular traffic in the bus barn parking area, thus increasing the safety environment for the bus mechanics walking between the bus barn and the buses that need maintenance.

Providing a Maintenance Facility (yard and shop) comparable to the maintenance facility used by NPS crews at C Camp would substantially improve the concessioner's ability to maintain park-owned assets, including visitor facilities, buildings, campgrounds, food service areas and public restrooms. Alternative 2 would have a minor beneficial impact on park operations by modernizing and making more efficient the maintenance, food storage, and recycle functions of the concessioner, and would aggregate concessioner employee fitness equipment in a location near the employee dorms and bath house.

*Cumulative Effects:* Over 80 acres of land have been disturbed in the park's entrance area in the past century due to construction for the Alaska Railroad, Denali Park Road, McKinley Airstrip, Denali Visitor Center complex, MSLC, Wilderness Access Center, bus barn and bus parking area, concessioner housing and support facilities and hiking trails (2001 EA). Another 5 acres was disturbed for the renovation of the wastewater treatment facility. This disturbance has had a moderate effect on the natural resources of the area. Construction of up to three managers' housing duplexes for a total of 0.4 acres of additional disturbance, near the north end of the bus maintenance facility for the year-round use of concessionaire management and maintenance staff, was already approved after review in the 2001 EA. Also approved in the 2001 EA were upgrades to the water, sewer, electrical, fire alarm and fiber optic systems. The 0.7 acres that would be disturbed under Alternative 2 would add less than 1% to the total disturbance of the area, and would amount to no more than minor effect on the tens of thousands of acres of similar vegetation communities, soils, wildlife habitat and other natural resources that surround the entrance area.

*Conclusion:* Alternative 2 would have a minor effect on the area's natural resources and no effect on the park's cultural resources while having a minor beneficial effect on park operations by providing modern permanent facilities for concessioner support functions. The level of impact to natural resources from Alternative 2 would not result in impairment of park resources that fulfill

specific purposes identified in the enabling legislations or that are essential to the natural and cultural integrity of the parks.

Project Costs: The Maintenance Shop, recycle building and related vehicle circulation area is expected to cost about \$1.6 million. The Commissary and Fitness Center are not funded at this time, but are estimated to total about \$1.8 million.

**List of Preparers:**

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Erik Hendrickson, Project Engineer, Denali National Park and Preserve

**References:**

NPS. 2001. Environmental Assessment for Construction of New Visitor Facilities in the Entrance Area of Denali National Park, Denali National Park and Preserve. USDOJ, NPS. 57 pp.

APPENDIX A  
**SUBSISTENCE - SECTION 810(a) OF ANILCA**  
SUMMARY EVALUATION AND FINDINGS

**I. INTRODUCTION**

This section was prepared to comply with Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). It summarizes the evaluation of potential restrictions to subsistence activities that could result from the construction of new concessioner support facilities in the entrance area of Denali National Park and Preserve.

**II. THE EVALUATION PROCESS**

Section 810(a) of ANILCA states:

"In determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands . . . the head of the federal agency . . . over such lands . . . shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs, the availability of other lands for the purposes sought to be achieved, and other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes. No such withdrawal, reservation, lease, permit, or other use, occupancy or disposition of such lands which would significantly restrict subsistence uses shall be effected until the head of such Federal agency -

(1) gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to section 805;

(2) gives notice of, and holds, a hearing in the vicinity of the area involved; and

(3) determines that (A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands, (B) the proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions."

ANILCA created new units and additions to existing units of the National Park System in Alaska. Denali National Park and Preserve was created by ANILCA Section 202(3)(a):

"The park additions and preserve shall be managed for the following purposes, among others: To protect and interpret the entire mountain massif, and additional scenic mountain peaks and formations; and to protect habitat for, and populations of, fish and wildlife, including, but not limited to, brown/grizzly bears, moose, caribou, Dall sheep, wolves, swans and other waterfowl; and to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other wilderness recreational activities."

Title I of ANILCA established national parks for the following purposes:

". . . to preserve unrivaled scenic and geological values associated with natural landscapes; to provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas; to preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coastal rainforest ecosystems to protect the resources related to subsistence needs; to protect and preserve historic and archeological sites, rivers, and lands, and to preserve wilderness resource values and related recreational opportunities including but not limited to hiking, canoeing, fishing, and sport hunting, within large arctic and subarctic wildlands and on free-flowing rivers; and to maintain opportunities for scientific research and undisturbed ecosystems.

". . . consistent with management of fish and wildlife in accordance with recognized scientific principles and the purposes for which each conservation system unit is established, designated, or expanded by or pursuant to this Act, to provide the opportunity for rural residents engaged in a subsistence way of life to continue to do so."

The potential for significant restriction must be evaluated for the proposed action's effect upon ". . . subsistence uses and needs, the availability of other lands for the purposes sought to be achieved and other alternatives which would reduce or eliminate the use. . . ." (Section 810(a))

### **III. PROPOSED ACTION ON FEDERAL LANDS**

Alternatives 1 and 2 are described in detail in the environmental assessment. Customary and traditional subsistence use on NPS lands will continue as authorized by federal law under all alternatives. Federal regulations implement a subsistence priority for rural residents of Alaska under Title VIII of ANILCA.

The NPS proposes to construct new concessioner support facilities in the concessioner land assignment that is centered on the bus maintenance facility west of the park road near the Denali Visitor Center in Denali National Park and Preserve. The sites are in the former Mount McKinley National Park wherein subsistence activities are not allowed.

### **IV. AFFECTED ENVIRONMENT**

Subsistence uses within Denali National Park and Preserve are permitted in accordance with Titles II and VIII of ANILCA. Section 202(3)(a) of ANILCA allows local residents to engage in subsistence uses in the ANILCA additions to the park where such uses are traditional in accordance with the provisions in Title VIII. Lands within former Mount McKinley National Park are closed to subsistence uses.

A regional population of approximately 300 eligible local rural residents qualifies for subsistence use of park resources. Resident zone communities for Denali National Park and Preserve are Cantwell, Minchumina, Nikolai, and Telida. By virtue of their residence, local rural residents of these communities are eligible to pursue subsistence activities in the new park additions. Local rural residents who do not live in the designated resident zone communities, but who have customarily and

traditionally engaged in subsistence activities within the park additions, may continue to do so pursuant to a subsistence permit issued by the Park Superintendent.

The NPS realizes that Denali National Park and Preserve may be especially important to certain communities and households in the area for subsistence purposes. The resident zone communities of Minchumina (population 22) and Telida (population 11) use park and preserve lands for trapping and occasional moose hunting along area rivers. Nikolai (population 122) is a growing community and has used park resources in the past. Cantwell (population 147) is the largest resident zone community for Denali National Park and Preserve, and local residents hunt moose and caribou, trap, and harvest firewood and other subsistence resources in the new park area.

The main subsistence species, by edible weight, are moose, caribou, furbearers, and fish. Varieties of subsistence fish include coho, king, pink and sockeye salmon. Burbot, dolly varden, grayling, lake trout, northern pike, rainbow trout and whitefish are also among the variety of fish used by local people. Beaver, coyote, river otter, weasel, lynx, marten, mink, muskrat, red fox, wolf and wolverine are important furbearer resources. Rock and willow ptarmigan, grouse, ducks and geese are important subsistence wildlife resources.

The NPS recognizes that patterns of subsistence use vary from time to time and from place to place depending on the availability of wildlife and other renewable natural resources. A subsistence harvest in any given year may vary considerably from previous years because of such factors as weather, migration patterns and natural population cycles. However, the pattern is assumed to be generally applicable to harvests in recent years with variations of reasonable magnitude.

## **V. SUBSISTENCE USES AND NEEDS EVALUATION**

To determine the potential impact on existing subsistence activities, three evaluation criteria were analyzed relative to existing subsistence resources that could be impacted.

The evaluation criteria are:

- the potential to reduce important subsistence fish and wildlife populations by (a) reductions in numbers; (b) redistribution of subsistence resources; or (c) habitat losses;
- the affect the action might have on subsistence fishing or hunting access; and
- the potential to increase fishing or hunting competition for subsistence resources.

The potential to reduce populations:

Provisions of ANILCA and Federal and State regulations provide protection for fish and wildlife populations within Denali National Park and Preserve.

Construction of concessioner support facilities in the concessioner land assignment would have a long-term but minor impact on wildlife habitat and populations.

The alternatives would not adversely affect the distribution or migration patterns of subsistence resources. Therefore, no change in the availability of subsistence resources is anticipated as a result of the implementation of this proposed action.

## Restriction of Access:

All rights of access for subsistence harvests on NPS lands are granted by Section 811 of ANILCA. Denali National Park and Preserve is managed according to legislative mandates, NPS management policies and the park's General Management Plan.

*Alternative 1 (No Action), the status quo would not significantly limit or restrict access to subsistence resources in Denali National Park and Preserve.*

*Alternative 2 (Proposed Action), will not limit or restrict the access of subsistence users to natural resources within the ANILCA additions of Denali National Park or Denali National Preserve. Federal and State regulations assure the continued viability of fish and wildlife populations.*

## Increase in Competition:

Alternative 1 (No-Action Alternative), maintaining the status quo would not result in increased competition for fish, wildlife or other resources that would significantly impact subsistence users in Denali National Park and Preserve.

Alternative 2 (Proposed Action). The proposed action would not result in increased competition for fish, wildlife or other resources that would significantly impact subsistence users in Denali National Park and Preserve. Federal and State regulations assure the continued viability of particular fish or wildlife populations. If it is necessary to restrict the taking of fish and wildlife to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population, subsistence uses are given a priority over other consumptive uses.

If, and when, it is necessary to restrict taking, subsistence uses are the priority consumptive users on public lands of Alaska and will be given preference on such lands over other consumptive uses (ANILCA, Section 802(2)).

Continued implementation of provisions of ANILCA should mitigate any increased competition, however significant, from resource users other than subsistence users. Therefore, the proposed action would not adversely affect resource competition.

## **VI. AVAILABILITY OF OTHER LANDS**

Choosing a different alternative would not decrease the impacts to park resources for subsistence. The preferred alternative is consistent with the mandates of ANILCA, including Title VIII, and the NPS Organic Act.

## **VII. ALTERNATIVES CONSIDERED**

The alternatives considered for this project were limited to the lands in and adjacent to the concessioner land assignment near the Denali Visitor Center. The alternatives are: 1) continue the existing conditions (No Action) which includes using old and inadequate structures to house the

concessioner maintenance operations, commissary, recycle center and fitness center; and 2) constructing new facilities to house these functions.

## **VIII. FINDINGS**

This analysis concludes that the preferred alternative would not result in a significant restriction of subsistence uses.